

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STATE OF TEXAS,

Defendant.

and

STUDENTS FOR AFFORDABLE
TUITION

Defendant-Intervenor

Case No.: 7:25-cv-00055-O

**STUDENTS FOR AFFORDABLE
TUITION'S OPPOSED MOTION TO
INTERVENE**

Under Federal Rule of Civil Procedure 24(a), Students for Affordable Tuition respectfully moves the Court to allow it to intervene in this civil action. As explained in the accompanying brief in support of this motion, Students for Affordable Tuition is entitled to intervene in this action as a matter of right under Fed. R. Civ. P. 24(a) because it has a significant interest in the continued validity of Texas's provision of reduced tuition rates for undocumented college and university students. In the alternative, Students for Affordable Tuition asks the Court to grant it permissive intervention under Fed. R. Civ. P. 24(b). Students for Affordable Tuition seeks to intervene in this matter for purposes of an appeal because Defendant State of Texas will not appeal. Attached is Students for Affordable Tuition's Proposed Answer. *See* Exhibit A. For these reasons, Students for Affordable Tuition asks the Court to grant it the right to intervene in this action.

Dated: June 11, 2025

Respectfully submitted,

/s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046)
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, Texas 78205
Facsimile: (210) 224-5382
Email: nperales@maldef.org

Thomas A. Saenz (Cal. Bar No. 159430)*
Fernando Nuñez (Cal. Bar No. 327390)*
Luis Lozada (Cal. Bar No. 344357)*
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
634 South Spring Street, 11th floor
Los Angeles, CA 90014
Facsimile: (213) 629-0266
Email: tsaenz@maldef.org
fnunez@maldef.org
llozada@maldef.org

Attorneys for Students for Affordable Tuition

**Pro Hac Vice Applications Forthcoming*

CERTIFICATE OF CONFERENCE

On June 10, 2025, Students for Affordable Tuition's counsel conferred with counsel for Plaintiff United States of America and Defendant State of Texas to determine if they consented to Students for Affordable Tuition's Motion to Intervene. Specifically, Students for Affordable Tuition's counsel conferred with the following counsel: Zac Rhines for Defendant State of Texas; and Elianis Perez for Plaintiff United States of America. Counsels for Plaintiff and Defendant oppose Students for Affordable Tuition's intervention. Counsels for Plaintiff and Defendant oppose Students for Affordable Tuition's intervention because the parties have resolved the matter to final judgment and the case has been terminated.

Dated: June 11, 2025

Respectfully submitted,

/s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046)
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, Texas 78205
Facsimile: (210) 224-5382
Email: nperales@maldef.org

Thomas A. Saenz (Cal. Bar No. 159430)*
Fernando Nuñez (Cal. Bar No. 327390)*
Luis Lozada (Cal. Bar No. 344357)*
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
634 South Spring Street, 11th floor
Los Angeles, CA 90014
Facsimile: (213) 629-0266
Email: tsaenz@maldef.org
fnunez@maldef.org
llozada@maldef.org

Attorneys for Students for Affordable Tuition

**Pro Hac Vice Applications Forthcoming*